

the investment adviser's business, ownership, clients, employees, business practices, affiliations, and any disciplinary events of the adviser or its employees. I also maintained a spreadsheet of clients who had left Chapwood which included the reasons for their departure. Finally, I worked in a general operations role, assisting with client relations.

3. I have reviewed both the affidavit of Kim Sams (attached hereto as Exhibit A) and the list of documents requested of Sams and Chapwood (attached hereto as Exhibit B). Based upon my experience as Chief Compliance Officer, I believe responsive documents and communications exist (or at least did at the time of my departure in September, 2019) and are not included in Exhibit A. The following paragraphs outline the basis for my belief, as of September, 2019:

a. Chapwood archives all of its emails on the Smarsh system, an online offsite cloud-based storage system, and should still have access to all of those emails.

b. Chapwood keeps its financials on Quickbooks and files annual tax returns, both of which would reflect net income.

c. As Chapwood's Chief Compliance Officer, I retained a list of Chapwood clients and a spreadsheet of clients who had cancelled their accounts *with* the reasons for the clients' cancellation. Much of this information is required by the SEC. This was particularly important during my tenure, since Chapwood was under an SEC audit while I worked for Chapwood.

d. As Chapwood's former Chief Compliance Officer, I am aware of communications with Charles Schwab and its representatives concerning its consideration and ultimate decision to terminate Chapwood's Investment Manager Services Agreement in 2017.

e. As Chapwood's former Chief Compliance Officer, I am aware of communications between Chapwood and other companies, including TD Ameritrade, attempting to find another broker-dealer and custodian for Chapwood's assets after Schwab terminated its agreement with Chapwood.

f. While I was at Chapwood, the company retained copies of all lawsuits and complaints.

4. In addition to the responsive documents listed above, while I was at Chapwood, I witnessed and/or was aware of Ed Butowsky tape recording many conversations while he was at work that would fall within the purview of the documents requested.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on this 7 day of May, 2020 at Frisco, Texas.



AMY SUHR

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

DAVID FOLKENFLIK; NATIONAL PUBLIC	§	
RADIO, INC.; EDITH CHAPIN; LESLIE	§	
COOK; and PALLAVI GOGOI	§	
	§	
Movants,	§	
v.	§	Civ. Action No. 4:20-MC-0036-ALM
	§	
CHAPWOOD CAPITAL INVESTMENT	§	Ancillary to Civ. Action No.
MANAGEMENT, INC.	§	4:18-CV-00442-ALM
	§	
Respondent.	§	

DAVID FOLKENFLIK; NATIONAL PUBLIC	§	
RADIO, INC.; EDITH CHAPIN; LESLIE	§	
COOK; and PALLAVI GOGOI	§	
	§	
Movants,	§	
v.	§	Civ. Action No. 4:20-MC-0038-ALM
	§	
KIM SAMS	§	Ancillary to Civ. Action No.
	§	4:18-CV-00442-ALM
	§	
Respondent.	§	

AFFIDAVIT OF KIM SAMS IN SUPPORT OF RESPONSE OF
CHAPWOOD CAPITAL INVESTMENT MANAGEMENT, LLC AND KIM SAMS
TO MOTIONS TO COMPEL CHAPWOOD CAPITAL INVESTMENT MANAGEMENT, LLC
AND KIM SAMS TO COMPLY WITH FED. R.CIV.P. 45 SUBPOENA
(DOC. 13 AND DOC. 12)

I, Kim Sams, declare under penalty of perjury as follows:

1. I have been served with a subpoena for production of documents in my capacity as the President of Chapwood Capital Investment Management, Inc. ("Chapwood" and the "Chapwood Subpoena", respectively) in the action pending in this Court filed by Ed Butowsky ("Butowsky") against the above-identified Movants under Civ. Action No. 4:18-CVB-0442-ALM (the "Butowsky Lawsuit") pending in the U.S. District Court for the Eastern District of Texas, Sherman Division. I have also been served with a subpoena for production of documents in my individual capacity (the "Sams Subpoena") in the Butowsky Lawsuit.

Exhibit A

2. I have personal knowledge of and am familiar with the Chapwood Subpoena and the Sams Subpoena and the documents sought to be produced to Movants therein (together, the "Subpoenas"). I am authorized to respond to the Subpoenas on behalf of Chapwood as its duly authorized corporate representative.

3. I have made a diligent and thorough search of my personal records, and have found no documents in my individual possession, custody or control that are responsive to any of the requests made of me in the Sams Subpoena. In my individual capacity, I have no right to demand possession of any documents responsive to any of the requests made in the Sams Subpoena that may be in the possession of another person.

4. I currently serve as the President of Chapwood and am a stockholder and member of the Board of Directors of Chapwood. I have access to all of the business records of Chapwood and am knowledgeable and familiar with its business and operations. I have made a diligent and thorough search of the business records of Chapwood and have found no documents in Chapwood's business records that are responsive to any of the requests made in the Chapwood Subpoena other than those contained in Exhibit A-1 attached hereto.

5. I am unaware of any person other than Ed Butowsky ("Butkowsky") and his prior or current lawyer(s) in the Butowsky Lawsuit that may have possession of any documents responsive to any of the requests made in the Chapwood Subpoena. Through my counsel, I have asked Butowsky to provide me with copies of any documents responsive to any of the requests in the Chapwood Subpoena and Sams Subpoena. I have received no documents responsive to this request.

6. With respect to the specific requests made in the Chapwood Subpoena, I testify as follows:

6.1. Other than the documents contained in Exhibit A-1, I have no documents referencing or relating to, or any communications between me or Chapwood and any of the following since January 1, 2014:

- a. Charles Schwab Corporation
- b. Charles Schwab & Co., Inc.
- c. Schwab Institutional Enterprises
- d. Charles R. Schwab
- e. Walter W. Betinger, II
- f. Bernard J. Clark
- g. Jonathan M. Craig
- h. Joseph R. Mafiinetto
- i. Nigel J. Murtagh
- j. William Bell
- k. Kevin Lewis

I have not communicated with any of the above-identified persons.

6.2 I have been unable to locate any documents or communications produced by Chapwood in any litigation, FINRA proceeding, NASD Dispute Resolution, or arbitration since January 1, 2009.

Exhibit A

6.3 I have been unable to locate any documents or communications that Charles Schwab & Co., Inc. may have sent to Chapwood in 2017 and 2018. I recall that Charles Schwab & Co. may have sent Chapwood a letter on or about 8/1/2017 terminating its relationship with Chapwood, but have been unable to locate such letter

6.4 I have been unable to locate any notes from meetings and conversations I or anyone associated with Chapwood may have had with Charles Schwab & Co. or its representatives other than the listing of accounts and values contained in Exhibit A-1.

6.5 I have been unable to locate any documents or communications evidencing or relating to a loss of business because of Charles Schwab & Co.'s termination of Chapwood's Investment Manager Services Agreement other than the listing of accounts and values contained in Exhibit A-1.

6.6 I am unaware of the existence of any documents or communications evidencing or relating to the loss of "over 268 customer accounts" as a result of Charles Schwab & Co.'s termination of Chapwood's Investment Manager Services Agreement other than the listing of accounts and values contained in Exhibit A-1.

6.7 I am unaware of the existence of any documents or communications evidencing attempts to find another broker-dealer and custodian for Chapwood's assets after Charles Schwab & Co. terminated its agreement with Chapwood.

6.8 I am unaware of any documents or communications evidencing the false statements and misrepresentations Charles Schwab & Co. made about Chapwood.

6.9 I am unaware of the existence of any documents or communications evidencing or relating to damages suffered as alleged in the Butowsky Lawsuit other than those terminating Chapwood's services other than the listing of accounts and values contained in Exhibit A-1.

6.10 Other than documents produced as part of Exhibit A-1 to this Affidavit, I am unaware of any documents referring or relating to, and communications with Sally Hill Davis, including communications relating to Ms. Davis' decision to remove Chapwood as her adviser on her Charles Schwab & Co. account.

6.11 I have located no documents or communications concerning any lawsuits, threats of lawsuits, consumer complaints, disciplinary actions, or accusations that accused Chapwood in its institutional or corporate capacity.

6.12 I have been unable to locate any documents or communications that may show Chapwood's annual net income between 2014 and the present time.

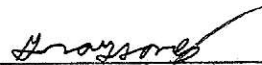
Signed this 4th day of May 2020.


Kim Sams

Exhibit A

State of Texas §
Collin County §

Subscribed and sworn to before me the undersigned Notary Public on this 4 day of May 2020, to which witness my hand and seal of office.



Notary Public, State of Texas

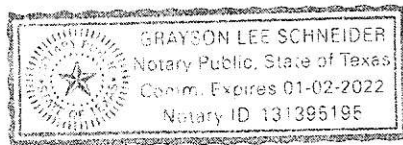


Exhibit A

Thursday, March 26, 2020 at 9:45:07 AM Central Daylight Time

Subject: Things have finally settled down here ...

Date: Wednesday, August 16, 2017 at 10:43:24 AM Central Daylight Time

From: [REDACTED]

To: Kim Sams

and I want to check in with you before I move my account back to Chapwood. You will be responsible for my account, not Ed? If so, I will move everything back.

Thank you, Kim.

All the best,

[REDACTED]

Thursday, March 26, 2020 at 9:45:56 AM Central Daylight Time

Subject: Re: Things have finally settled down here ...
Date: Wednesday, August 16, 2017 at 1:01:39 PM Central Daylight Time
From: [REDACTED]
To: Kim Sams

Kim,
I called Schwabb and they tell me this has to originate with you, with me signing paperwork that you send me.
I'm sorry to have to do all this again. If we can do this electronically, that's great with me.
Thanks,
[REDACTED]

On Aug 16, 2017, at 9:57 AM, Kim Sams <kim@chapwoodinvestments.com> wrote:
Thank you for circling back. Yes, you have my word. It will be just me and my support Amy and Brittney.
I didn't want to bother you with everything you had going on. Thank you for reconsidering and this means more
to me than you know.

Thank you.

Kim

-----Original Message-----

From: [REDACTED]

Sent: Wednesday, August 16, 2017 10:43 AM

To: Kim Sams <kim@chapwoodinvestments.com>

Subject: Things have finally settled down here ...

and I want to check in with you before I move my account back to Chapwood. You will be responsible for my
account, not Ed? If so, I will move everything back.

Thank you, Kim.

All the best,
[REDACTED]

Thursday, March 26, 2020 at 9:47:43 AM Central Daylight Time

Subject: RE: Things have finally settled down here ...
Date: Wednesday, August 16, 2017 at 10:57:53 AM Central Daylight Time
From: Kim Sams.
To: [REDACTED]

Thank you for circling back. Yes, you have my word. It will be just me and my support Amy and Brittney.

I didn't want to bother you with everything you had going on. Thank you for reconsidering and this means more to me than you know.

Thank you.

Kim

-----Original Message-----

From: [REDACTED]
Sent: Wednesday, August 16, 2017 10:43 AM
To: Kim Sams <kim@chapwoodinvestments.com>
Subject: Things have finally settled down here ...

and I want to check in with you before I move my account back to Chapwood. You will be responsible for my account, not Ed? If so, I will move everything back.

Thank you, Kim.

All the best,

[REDACTED]

[REDACTED]

Thursday, March 26, 2020 at 9:43:19 AM Central Daylight Time

Subject: my Chapwood account

Date: Thursday, August 3, 2017 at 5:29:05 PM Central Daylight Time

From: [REDACTED]

To: Ed Butowsky, Kim Sams

Hello Ed and Kim,

I'm really sad to write this email.

I have to let you know I asked Schwab to remove Chapwood Investments as the advisor on my Schwab Account. I will follow up with a phone call tomorrow, August 4.

I made this decision after reading news articles about Ed's involvement with a false news story. For me, this is not a question of politics. It's a question of ethics.

I very much appreciate all your help and guidance through the past twenty-five years or so. I'm heartbroken to end our relationship.

All the best,

[REDACTED]

Thursday, March 26, 2020 at 9:48:46 AM Central Daylight Time

Subject: RE: Things have finally settled down here ...
Date: Wednesday, August 16, 2017 at 1:38:42 PM Central Daylight Time
From: Kim Sams
To: [REDACTED]
CC: Amy Suhr, Brittney Harrison

We will get the forms prepared and will emailed to you today.

Thank you again.

Kim

-----Original Message-----

From: [REDACTED]
Sent: Wednesday, August 16, 2017 1:02 PM
To: Kim Sams <kim@chapwoodinvestments.com>
Subject: Re: Things have finally settled down here ...

Kim,

I called Schwabb and they tell me this has to originate with you, with me signing paperwork that you send me. I'm sorry to have to do all this again. If we can do this electronically, that's great with me.

Thanks,
[REDACTED]

On Aug 16, 2017, at 9:57 AM, Kim Sams <kim@chapwoodinvestments.com> wrote:

Thank you for circling back. Yes, you have my word. It will be just me and my support Amy and Brittney. I didn't want to bother you with everything you had going on. Thank you for reconsidering and this means more to me than you know.

Thank you.

Kim

-----Original Message-----

From: [REDACTED] [mailto:[REDACTED]]
Sent: Wednesday, August 16, 2017 10:43 AM
To: Kim Sams <kim@chapwoodinvestments.com>
Subject: Things have finally settled down here ...

and I want to check in with you before I move my account back to Chapwood. You will be responsible for my account, not Ed? If so, I will move everything back.

Thank you, Kim.

All the best,
[REDACTED]

Account Values	Account Number	Account Name	Custodian	Start Date	Closed Date
[REDACTED]					
Last Account Value: \$4,770,590		[REDACTED] Joint	Schwab	06/06/2017	01/22/2018
Last Account Value: \$300,000		[REDACTED] Pretant Financial	Alternative Investment	07/19/2017	02/07/2018
[REDACTED]					
Last Account Value: \$636,640		[REDACTED] Individual	Schwab	05/08/2012	01/22/2018
Last Account Value: \$1,782,336		[REDACTED] MCD	Schwab	12/17/2014	01/22/2018
Last Account Value: \$235,212		[REDACTED] ROTH IRA	Schwab	12/16/2015	01/22/2018
Last Account Value: \$4,023,681		[REDACTED] Trust	Schwab	02/17/2016	01/22/2018
Last Account Value: \$2,347,629		[REDACTED] Trust	Schwab	02/16/2016	01/22/2018
Last Account Value: \$1,612,078		[REDACTED] ROTH IRA	Schwab	12/16/2015	01/22/2018
[REDACTED]					
Last Account Value: \$2,506,858		[REDACTED] - JT	JP Morgan	12/14/2011	8/1/2017
[REDACTED]					
Last Account Value: \$493,422		[REDACTED] ROTH IRA	Schwab	12/31/2010	01/22/2018
Last Account Value: \$8,403		[REDACTED] SEP IRA	Schwab	04/06/2017	01/22/2018
Last Account Value: \$85,650		[REDACTED] Chap MA	Manual Account	05/10/2016	09/24/2018
[REDACTED]					
Last Account Value: \$44,963		[REDACTED] Trust	Schwab	03/11/2015	10/24/2017
[REDACTED] (Came back as Client)					
Undefined		[REDACTED]	TD Ameritrade	02/07/2018	02/06/2018
Undefined		[REDACTED]	TD Ameritrade	02/07/2018	02/06/2018
Undefined		[REDACTED]	TD Ameritrade	04/22/2013	02/28/2018
Undefined		[REDACTED]	TD Ameritrade	02/07/2018	02/06/2018
Undefined		[REDACTED]	TD Ameritrade	02/07/2018	02/06/2018
Undefined		[REDACTED]	Schwab	04/26/2013	04/30/2013
Undefined		[REDACTED] Separate Property Trust	Schwab	04/26/2013	04/30/2013
Undefined		[REDACTED]	Schwab	12/31/2010	12/30/2010
[REDACTED] (Later transfer)					
Undefined		[REDACTED] JT	TD Ameritrade	01/24/2018	01/23/2018
Undefined		[REDACTED] Indiv	Schwab	01/10/2012	01/09/2012
Undefined		[REDACTED] Indiv	TD Ameritrade	01/24/2018	01/23/2018
Undefined		[REDACTED] IRA	TD Ameritrade	01/23/2018	01/22/2018
[REDACTED]					
Last Account Vaue: \$517,001		[REDACTED]	Manual Account	03/31/2014	02/07/2018
Last Account Value: \$231,942		[REDACTED] Chapwood MA	Manual Account	06/30/2015	08/31/2017
Last Account Value: \$132,604		[REDACTED] Household Expense	Schwab	01/11/2013	08/11/2017
Last Account Value: \$8,406,105		[REDACTED]	Schwab	10/08/2012	08/11/2017
Last Account Value: \$77,814		[REDACTED] IRA	Schwab	11/14/2012	08/11/2017
[REDACTED]					
Last Account Value: \$119,910		[REDACTED] IRA	Schwab	02/17/2017	01/22/2018
Last Account Value: \$120,439		[REDACTED] SEP IRA	Schwab	02/17/2017	01/22/2018

	[REDACTED]	
	Last Account Value: \$61,153	
	[REDACTED]	
	Last Account Value: \$266,661	
	Last Account Value: \$115,700	
	Last Account Value: \$3,960,505	
	[REDACTED]	
	Last Account Value: \$176,087	
	Last Account Value: \$2,930,852	
	Last Account Value: \$465,519	
	Last Account Value: \$201,162	
	Last Account Value: \$857,839	
	[REDACTED]	
	Last Account Value: \$95,425	
	[REDACTED]	
	Last Account Value: \$1,761,462	
	[REDACTED]	
	Last Account Value: \$11,338	
	[REDACTED]	
	(MERGED ACCOUNT NO KNOWN VALUE)	
	Last Account Value: \$1,614,885	
	(MERGED ACCOUNT NO KNOWN VALUE)	
	Last Account Value: \$363,726	
	[REDACTED]	
	Last Account Value: \$7,558,395	
	[REDACTED]	
	Last Account Value: \$674,088	
	(MERGED ACCOUNT NO KNOWN VALUE)	
	(MERGED ACCOUNT NO KNOWN VALUE)	
	Last Account Value: \$441,373	
	[REDACTED]	
	Last Account Value: \$20,204	
	[REDACTED]	
	Last Account Value: \$24,088	
	Last Account Value: \$197,227	
	Last Account Value: \$21,528	
	Last Account Value: \$124	
	Last Account Value: \$11,536	

[REDACTED] IRA	Schwab	02/16/2017	01/22/2018
[REDACTED] Alternative Investment	Alternative Investment	12/23/2016	
[REDACTED] Manual Account	Manual Account	12/31/2010	
[REDACTED] Schwab	Schwab	12/31/2010	
[REDACTED] Schwab	Schwab	03/02/2017	03/14/2017
[REDACTED] Schwab	Schwab	12/31/2010	12/21/2017
[REDACTED] Schwab	Schwab	01/10/2012	12/21/2017
[REDACTED] Schwab	Schwab	10/25/2012	12/21/2017
[REDACTED] Schwab	Schwab	11/01/2012	12/21/2017
[REDACTED] Schwab	Schwab	02/16/2017	01/22/2018
[REDACTED] Schwab	Schwab	02/16/2017	01/22/2018
[REDACTED] Schwab	Schwab	02/16/2017	01/22/2018
[REDACTED] TD Ameritrade	TD Ameritrade	01/25/2018	01/24/2018
[REDACTED] TD Ameritrade	TD Ameritrade	01/10/2012	10/19/2018
[REDACTED] TD Ameritrade	TD Ameritrade	01/24/2018	01/23/2018
[REDACTED] TD Ameritrade	TD Ameritrade	01/06/2012	10/19/2018
[REDACTED] JP Morgan	JP Morgan	11/13/2012	09/28/2018
[REDACTED] Chap MA	Manual Account	05/05/2017	07/03/2018
[REDACTED] - Joint	Schwab	01/23/2017	01/22/2017
[REDACTED] - Joint	TD Ameritrade	01/18/2018	01/17/2018
[REDACTED] - Joint	TD Ameritrade	01/23/2017	06/08/2018
[REDACTED] CUST ROTH IRA	Schwab	12/31/2010	01/22/2018
[REDACTED] SEP IRA Rollover	Schwab	11/10/2014	10/19/2017
[REDACTED] IRA Rollover	Schwab	07/31/2012	01/22/2018
[REDACTED] IRA Rollover	Schwab	02/07/2017	10/19/2017
[REDACTED]	Schwab	02/07/2017	01/22/2018
[REDACTED]	Schwab	02/07/2017	10/19/2017

(MERGED ACCOUNT NO KNOWN VALUE)		[REDACTED] - Rollover IRA	TD Ameritrade	01/29/2018	01/28/2018
Last Account Value: \$415,209		[REDACTED] - HCV	TD Ameritrade	02/06/2018	02/13/2018
(MERGED ACCOUNT NO KNOWN VALUE)		[REDACTED]	TD Ameritrade	01/29/2018	01/28/2018
(MERGED ACCOUNT NO KNOWN VALUE)		[REDACTED]	TD Ameritrade	01/21/2016	02/28/2018
(MERGED ACCOUNT NO KNOWN VALUE)		[REDACTED]	TD Ameritrade	01/29/2018	01/28/2018
(MERGED ACCOUNT NO KNOWN VALUE)		[REDACTED]	TD Ameritrade	12/15/2016	01/28/2018
Last Account Value: \$88,239		[REDACTED] 529 Plan	Manual Account	04/29/2011	09/19/2018
Last Account Value: \$43,905		[REDACTED] - Indiv	Schwab	12/31/2010	11/15/2017
Last Account Value: \$177,486		[REDACTED] IRA	Schwab	12/31/2010	01/22/2018
Last Account Value: \$10,234		[REDACTED] - Indv	Schwab	06/22/2016	06/21/2017
Last Account Value: \$83,911		[REDACTED]	Alternative Investment	12/28/2016	09/26/2017
Last Account Value: \$748,442		[REDACTED]	Schwab	11/29/2016	09/26/2017
Last Account Value: \$19,811		[REDACTED]	Schwab	07/10/2015	01/22/2018
Last Account Value: \$134,163		[REDACTED] Individual	Schwab	06/26/2013	01/22/2018
Last Account Value: \$33,705		[REDACTED] - IRA	Schwab	06/19/2013	01/22/2018
Last Account Value: \$368,727		[REDACTED] - IRA Rollover	Schwab	01/31/2013	01/22/2018

EXHIBIT B

DOCUMENTS REQUESTED

Please produce the following documents, records, and information in your possession, custody, or control:

1. All documents referring or relating to, and all communications between, You and the following since January 1, 2014:
 - a. Charles Schwab Corporation
 - b. Charles Schwab & Co., Inc.
 - c. Schwab Institutional Enterprise
 - d. Charles R. Schwab
 - e. Walter W. Bettinger, II
 - f. Bernard J. Clark
 - g. Jonathan M. Craig
 - h. Joseph R. Martinetto
 - i. Nigel J. Murtagh
 - j. William Bell
 - k. Kevin Lewis
2. All documents and communications produced by Chapwood Capital Investment Management in any litigation, FINRA proceeding, NASD Dispute Resolution, or arbitration since January 1, 2009.
3. All documents and communications Charles Schwab & Co., Inc. sent to Chapwood Capital Investment Management in 2017 and 2018.
4. All notes from all meetings and conversations with Charles Schwab & Co. or its representatives.
5. All documents and communications evidencing or relating to a \$45 million loss of business because of Charles Schwab & Co.'s termination of Chapwood's Investment Manager Services Agreement.
6. All documents and communications evidencing or relating to the loss of "over 268 customer accounts" as a result of Charles Schwab & Co.'s termination of Chapwood's Investment Manager Services Agreement as alleged in *Chapwood Capital Inv. Mgmt., LLC et al. v. Charles Schwab Corp. et al.*, No. 18-cv-00287-RAS, Dkt. 1 para. 22(c) (E.D. Tex.).

7. All documents and communications evidencing attempts to find another broker-dealer and custodian for Chapwood Investment Management's assets after Charles Schwab & Co. terminated its agreement with Chapwood Investment Management.
8. All documents and communications evidencing the false statements and misrepresentations Charles Schwab & Co. made about Chapwood Investment Management.
9. All documents and communications evidencing or relating to damages suffered as alleged in *Butowsky v. Folkenflik et al.*, No. 4:18-cv-422-ALM (E.D. Tex.) (the "**NPR litigation**").
10. All documents referring or relating to, and communications to or from You relating to any allegations in the Complaint in the NPR litigation, as defined above, or the Wheeler Complaint, the Aaron Rich Complaint, or the Joel & Mary Rich Complaint, including but not limited to communications with Rod Wheeler, Malia Zimmerman, Adam Housley, Doug Wigdor, Wigdor LLP, Matt Couch, Admiral James A. Lyons, Aaron Rich, Joel Rich, Mary Rich, Kelsey Mulka, Steve Bannon, Sean Spicer, Ellen Ratner, and/or Larry Johnson.
11. All documents referring or relating to, and communications with Sally Hill Davis, including communications relating to Ms. Davis' decision to remove Chapwood Investment Management as the adviser on her Charles Schwab & Co. account, as alleged in footnote 4 of the Second Amended Complaint in the NPR litigation.
12. All documents and communications concerning any lawsuits, threats of lawsuits, consumer complaints, disciplinary actions, or accusations that accused Chapwood Investment Management of fraudulent conduct (including making false statements), including but not limited to while Chapwood Investment Management maintained a relationship with Charles Schwab.
13. All documents and communications sufficient to show Chapwood Investment Management's annual net income between 2014 and the present.